



**LAW DEPARTMENT**

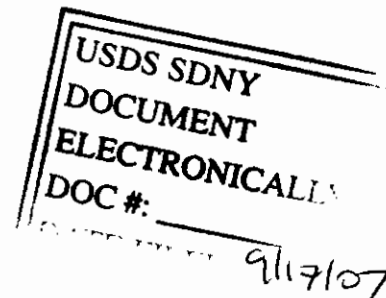
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September 13, 2007



**VIA HAND DELIVERY**

The Honorable Richard J. Sullivan  
United States District Court Judge  
Southern District of New York  
500 Pearl Street, Room 615  
New York, New York 10007

Re: Christopher B. Turcotte and Susan Turcotte v. Blue Cross Blue Shield of  
Massachusetts, Inc., 07 Civ. 4023 (RJS)

Dear Judge Sullivan:

I am writing with respect to the pre-motion conference scheduled in the above-captioned case for September 21 at 11:00. I have been admitted pro hac vice to represent Blue Cross and Blue Shield of Massachusetts ("Blue Cross"). I am writing to inquire whether it would be possible for me to participate in the conference by telephone. Local counsel for Blue Cross, Diana Gomprecht, will be present at the conference.

Thank you for your assistance.

Very truly yours,

*Joseph Halpern*

Joseph Halpern

cc: Christopher Turcotte, Esq.  
Diana Gomprecht, Esq.

*Mr. Halpern will be permitted to participate by telephone. Counsel to call my chambers at 212-805-0264.*

*Richard J. Sullivan*  
9/17/07

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Blue Cross and Blue Shield of Massachusetts is an independent member of The Blue Cross and Blue Shield Association.